

Celeste Holpp

From: Celeste Holpp
Sent: Friday, May 04, 2007 10:34 AM
To: 'Tyrone Townsend'
Cc: brn_leonard@yahoo.com; Finleylawfirm@aol.com
Subject: RE: Fwd: RE: Hester/our file 5918

I am not sure what additional info you are wanting from me.

I confirmed yesterday Mr. Brown's deposition for 2:00 on Thursday, May 10th – he is not available that morning as he will be coming off a 24-hour work shift to make this happen & driving immediately from the coast area to Montgomery to make it by 2:00.

I have given you dates I am available for Dep. Harris' and your expert's depositions. Do any of the other dates I provided work for you – other than the 14th & 17th - for Harris' & your expert's depositions (it doesn't sound like your trial conflicts with May 11 & May 17)?

I still need you to confirm your clients' depositions for the morning of May 10th – please provide confirmation today. Thank you.

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From: Tyrone Townsend [<mailto:ttowns1@msn.com>]
Sent: Friday, May 04, 2007 10:32 AM
To: Celeste Holpp
Cc: brn_leonard@yahoo.com; Finleylawfirm@aol.com
Subject: RE: Fwd: RE: Hester/our file 5918

Dear Celeste,

Unfortunately I have discovered a conflict with the May 14, date. I am slated to start a jury trial the morning of the 14th and I fully expect the trial to last 3 days if not longer. Our discovery deadline is also on the 17th of May. Since the judge has already extended the deadline once I am not sure he will do so again. Please get back to me immediately so we can try to get a solid schedule for depositions done today. Also I hope to have spoken with my clients and co-counsel sometime today so that I can tender a revised settlement offer in hopes of resolving this case expeditiously. Thank you.

Tyrone Townsend

From: "Celeste Holpp" <cholpp@nwkt.com>
 To: "Tyrone Townsend" <ttowns1@msn.com>
 CC: <brn_leonard@yahoo.com>, <Finleylawfirm@aol.com>
 Subject: RE: Fwd: RE: Hester/our file 5918
 Date: Fri, 4 May 2007 10:09:24 -0500

Thanks Tyrone. Please check with Richard Hill to see if Dep. Harris is available on the 14th before serving a subpoena for his deposition. Please also advise when your expert is available for deposition on those same dates I provided to you.

I look forward to receiving your demand and seeing if we can resolve this case within reason. Thank you.

6/18/2007

